

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

KATIE MILLIO, IRENE JOHNSON
JANINE HELLER and TOMAYITA
STEVENSON,
Plaintiffs,

V.

ULTRASOUND DIAGNOSTIC SCHOOL:
WHITMAN EDUCATION GROUP,
CAREER EDUCATION CORP.,
and LOUIS GIANNELLI,
Defendants.

DOCKET NO. 04-cv-30130-MAP

**PLAINTIFF MILILLO'S MOTION TO QUASH
SUBPOENA DIRECTED TO DR. REDA ISHAK**

The plaintiff Katie Milillo respectfully submits this Motion to Quash the pending subpoena for her medical records and other documents from her treating physician, Dr. Reda Ishak.

The issue of whether this information is reasonably likely to lead to the discovery of admissible evidence has already been briefed and decided by the Court. Ms. Milillo incorporates by reference all arguments made with regard to her medical providers and records at pages 3-6 of Plaintiffs' Opposition to the Defendants' Motion to Compel, filed with the Court on September 13, 2005.

As set forth in the accompanying Memorandum of Law and Exhibits, the foregoing, the pending subpoena to Dr. Ishak should be quashed. In addition, the Court should order the corporate defendants to pay attorney's fees as a sanction for requiring the plaintiff's counsel to quash a subpoena that seeks

information previously determined by this Court as “overly broad and, given the answers otherwise provided Defendants, unlikely to lead to the discovery of admissible evidence.”

Dated: October 18, 2005

Respectfully submitted,
THE PLAINTIFFS
By their attorney,

/s/ Suzanne Garrow
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CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing document was served by electronic or first class mail upon the attorneys of record for the defendants on October 18, 2005.

/s/ Suzanne Garrow
Suzanne Garrow